

# **EXHIBIT 3**

**From:** [Marlene Goldenberg](#)  
**To:** [Harkins, Steven M. \(Assoc-ATL-LT\)](#); [decvalsartan@btlaw.com](mailto:decvalsartan@btlaw.com)  
**Cc:** [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)  
**Subject:** Re: Losartan and Irbesartan Core Discovery  
**Date:** Monday, June 27, 2022 9:32:17 AM  
**Attachments:** [image002.png](#)  
[image001.png](#)  
[Outlook-ch5yhu2v.png](#)

---

Steve,

I am available today from 11 until 12:30 Central or tomorrow from 2-3 Central.

If those don't work, please throw out some other options, and we'll see if we can make something work. With that said, I would like to know in advance of any call if we have a dispute. Understanding that these are mostly the same categories that all parties had at the beginning of the case, I would be surprised if this needed to be a long discussion.

Thanks again,

Marlene



**Marlene J. Goldenberg • Partner**

**GOLDENBERGLAW, PLLC**

800 LaSalle Avenue, Suite 2150, Minneapolis, MN 55402

Direct: (612) 436-5028 • Toll-Free: (855) 333-4662 X528 • Fax: (612) 367-8107

[email](#) • [website](#) • [bio](#)

---

**From:** [harkinss@gtlaw.com](mailto:harkinss@gtlaw.com) <[harkinss@gtlaw.com](mailto:harkinss@gtlaw.com)>  
**Sent:** Thursday, June 23, 2022 9:19 PM  
**To:** Marlene Goldenberg <[mjgoldenberg@goldenberglaw.com](mailto:mjgoldenberg@goldenberglaw.com)>; [decvalsartan@btlaw.com](mailto:decvalsartan@btlaw.com)  
<[decvalsartan@btlaw.com](mailto:decvalsartan@btlaw.com)>  
**Cc:** [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com) <[valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)>  
**Subject:** RE: Losartan and Irbesartan Core Discovery

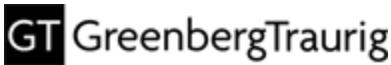
Marlene,

We are discussing on our side but as you know the losartan and irbesartan supply chains involve parties who did not participate in valsartan core discovery. Please let us know some times next week when Plaintiffs are available to meet and confer on the attached requests.

Best,

**Steven M. Harkins**  
Associate

Greenberg Traurig, LLP  
Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
T +1 678.553.2312 | F +1 678.553.2441  
[harkinss@gtlaw.com](mailto:harkinss@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



---

**From:** Marlene Goldenberg <mjgoldenberg@goldenberglaw.com>

**Sent:** Tuesday, June 21, 2022 12:51 PM

**To:** 'DECValsartan@btlaw.com' <decvalsartan@btlaw.com>

**Cc:** Valsartan PEC Listserv <valpec@kirtlandpackard.com>

**Subject:** [EXTERNAL]Losartan and Irbesartan Core Discovery

**\*EXTERNAL TO GT\***

Counsel,

We are reaching out to discuss core discovery for losartan and irbesartan. We are attaching our proposed categories which are nearly identical to the core discovery for valsartan. Please let us know if you will agree to these categories or if you would like to set up a time to meet and confer on this.

Thank you,

Marlene



**Marlene J. Goldenberg • Partner**

**GOLDENBERGLAW, PLLC**

800 LaSalle Avenue, Suite 2150, Minneapolis, MN 55402

Direct: (612) 436-5028 • Toll-Free: (855) 333-4662 X528 • Fax: (612) 367-8107

[email](#) • [website](#) • [bio](#)

CONFIDENTIALITY NOTICE: This email and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify us immediately by return email and promptly delete this message and its attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

---

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com), and do not use or disseminate the information.